

Control Number: 51415

Item Number: 355

Addendum StartPage: 0

7000

SOAH DOCKET NO. 473-21-0538 PUC DOCKET NO. 51415 2021 APR - 0 PM 3: 39

APPLICATION OF SOUTHWESTERN § BEFORE THE STATE OFFICE ELECTRIC POWER COMPANY FOR AUTHORITY TO CHANGE RATES § ADMINISTRATIVE HEARINGS

SOUTHWESTERN ELECTRIC POWER COMPANY'S STATEMENT UNDER SECTION 4 OF PROTECTIVE ORDER

Certain information provided in response to Cities Advocating Reasonable Deregulation's (CARD) Eleventh Request for Information to Southwestern Electric Power Company (SWEPCO), Question Nos. 11-3, 11-4, 11-5, and 11-6 are exempt from public disclosure pursuant to Sections 552.101 and 552.110 of the Public Information Act¹ and Tex. Util. Code § 32.101 (c) and are subject to treatment as Highly Sensitive materials.

The information provided in response to CARD's Question Nos. 11-3, 11-4, 11-5, and 11-6 contains non-public confidential customer information including usage data that if released, would provide an advantage to a competitor or bidder and could cause substantial competitive harm to SWEPCO.

Counsel for SWEPCO has reviewed these responses sufficiently to state in good faith that they are exempt from disclosure under the Public Information Act and merit the Highly Sensitive designation given to them.

¹ Tex. Gov. Code Ann. § 552.001-.353.

Respectfully submitted,

Melissa Gage

State Bar No. 24063949

Email: magage(a)aep.com

aepaustintx@aep.com (Service)

Leila Melhem

State Bar No. 24083492

Email: lmmelhem@aep.com

aepaustintx@aep.com (Service)

400 West 15th Street, Suite 1520

Austin, Texas 78701

Telephone: (512) 481-3320 Facsimile: (512) 481-4591

AMERICAN ELECTRIC POWER SERVICE CORPORATION

William Coe

State Bar No. 00790477

Email: wcoe(a)dwmrlaw.com

Kerry McGrath

State Bar No. 13652200

Email: kmcgrath(a);dwmrlaw.com

Patrick Pearsall

State Bar No. 24047492

Email: ppearsall(a)dwmrlaw.com

Stephanie Green

State Bar No. 24089784

Email: sgreen@dwmrlaw.com

P.O. Box 1149

Austin, Texas 78767

Telephone: (512) 744-9300 Facsimile: (512) 744-9399

DUGGINS WREN MANN & ROMERO, LLP

By: Rexhaure Green
Stephanie Green

ATTORNEYS FOR SOUTHWESTERN ELECTRIC POWER COMPANY

CERTIFICATE OF SERVICE

I certify that, unless otherwise ordered by the presiding officer, notice of the filing of this document was provided to all parties of record via electronic mail on April 9, 2021, in accordance with the Second Order Suspending Rules issued in Project No. 50664 and Order No. 1 in this matter.

Hoghanie Green
Stephanie Green